

Presentment Date: April 24, 2024 at 4:00 p.m. (Prevailing Eastern Time)
Objection Deadline: April 23, 2024 at 4:00 p.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**NOTICE OF PRESENTMENT OF
THE DEBTORS’ PROPOSED ORDER
ALLOWING CERTAIN CLAIMS PURSUANT TO 11 U.S.C. § 502**

PLEASE TAKE NOTICE that, on January 19, 2023, Genesis Global Holdco, LLC and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that on April 4, 2023, the Court entered the bar date order (ECF No. 200) (the “Bar Date Order”), which, among other things, established May 22, 2023, as the general bar date by which certain creditors must have filed proofs of claim in these chapter 11 cases (the “General Bar Date”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

PLEASE TAKE FURTHER NOTICE that on February 26, 2024, the Debtors filed the *Debtors' Amended Joint Chapter 11 Plan* (ECF No. 1392) (as it may be revised, amended modified and/or supplemented from time to time, the "Plan").²

PLEASE TAKE FURTHER NOTICE that pursuant to the terms of the Plan, Proofs of Claim must be Allowed³ by Final Order of the Bankruptcy Court in order to be eligible to receive initial distributions on the Initial Distribution Date.

PLEASE TAKE FURTHER NOTICE that the Debtors and their advisors have been comprehensively reviewing and reconciling all Claims, including the Proofs of Claim filed in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that on April 17, 2024 the Debtors filed the *Notice of Presentment of the Debtors' Proposed Order Allowing Certain Claims Pursuant to 11 U.S.C § 502* (the "Proposed Order"), attached hereto as Exhibit A. A list of the Proofs of Claim to be allowed (the "Allowed Claims") is attached to the Proposed Order as Exhibit 1.⁴

PLEASE TAKE FURTHER NOTICE that the Proposed Order seeks to allow the Proofs of Claim listed on Exhibit 1 to the Proposed Order in the amounts and classes asserted in the applicable Proof of Claim.

PLEASE TAKE FURTHER NOTICE that, should the Court enter the Proposed Order, the Allowed Claims will be eligible to receive distributions, including on the Initial Distribution Date, pursuant to the Plan.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the relief requested in the Proposed Order shall: (a) be in writing; (b) filed electronically with the Court no later than **April 23, 2024 at 4:00 p.m. (Prevailing Eastern Time)** (the "Objection Deadline"); and (c) served as required by the *Order Implementing Certain Notice and Case Management Procedures*, ECF No. 44 (the "Case Management Order") entered in these Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE that if no objections are timely filed and served with respect to the Proposed Order by the Objection Deadline, the Debtors shall, on or after

² Capitalized terms not defined herein have the meaning ascribed thereto in the Plan.

³ The Plan defines "Allowed" as follows: "with reference to any Claim or Interest, except as otherwise provided herein, (i) (a) any Claim or Interest arising on or before the Effective Date that is either (x) evidenced by a Proof of Claim or Interest that is, as applicable, timely Filed by the applicable Claims Bar Date, or (y) a Claim or Interest that is listed in the Schedules as not contingent, not unliquidated, and not disputed, and for which no Proof of Claim has been timely Filed by the applicable Claims Bar Date, and (b) *as to which no objection to allowance has been interposed within the time period set forth in the Plan* and such Claim or Interest is not Disputed or as to which any objection has been determined by a Final Order of the Bankruptcy Court to the extent such objection is determined in favor of the respective Holder or (ii) any Claim or Interest expressly allowed under the Plan or by a Final Order of the Bankruptcy Court; *provided* that, notwithstanding the foregoing, no Claim of any Entity subject to section 502(d) of the Bankruptcy Code shall be deemed Allowed unless and until such Entity pays in full the amount that it owes to the applicable Debtor or Wind-Down Debtor; *provided further* that any setoff exercised pursuant to Article IV.B.16 of the Plan shall be taken into account when calculating the extent to which any Claim is Allowed." (emphasis added).

⁴ The failure to include a Claim on Exhibit 1 to the Proposed Order should not be interpreted as meaning that the Claim will or will not be Allowed or receive distributions, including on the Initial Distribution Date.

April 24, 2024 at 4:00 p.m. (Prevailing Eastern Time) (the “Presentment Date”), submit to the Bankruptcy Court an order substantially in the form of Exhibit A, attached hereto, which order the Bankruptcy Court may enter without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served by the Objection Deadline, the Debtors shall notice a hearing (the “Hearing”) with respect to the Stipulation and Order, which shall be held via Zoom and attended by the Debtors and all objecting parties. Failure to attend the Hearing may result in entry of the Stipulation and Order without further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that copies of the Stipulation and Order can be viewed and/or obtained by: (a) accessing the Court’s website at www.nysb.uscourts.gov (PACER password required) or (b) from the Debtors’ proposed notice and claims agent, Kroll Restructuring Administration LLC, which maintains a website at <https://restructuring.ra.kroll.com/genesis> or by calling +1 888 524 2017.

Dated: April 17, 2024
New York, New York

/s/ Luke A. Barefoot
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Exhibit A

Proposed Order

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER ALLOWING CERTAIN
CLAIMS PURSUANT TO 11 U.S.C. § 502**

Upon the *Notice of Presentment of the Debtors’ Proposed Order Allowing Certain Claims Pursuant To 11 U.S.C. § 502*² (the “Notice of Presentment”) of Genesis Global Holdco, LLC and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), for entry of an order (this “Order”) allowing the Proofs of Claim listed on Exhibit 1 attached hereto; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 175 Greenwich Street, Floor 38, New York, NY 10007.

² All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Notice of Presentment.

the Southern District of New York, dated January 31, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Notice of Presentment in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Notice of Presentment is in the best interests of the Debtors, their estates, their creditors and other parties-in-interest; and the Court having found that the Debtors' notice of the Notice of Presentment and opportunity for a hearing on the Notice of Presentment was appropriate and no other notice need be provided; and the Court having reviewed the Notice of Presentment and the relief requested therein; and the Court having determined that the legal and factual bases set forth in the Notice of Presentment establish just cause for the relief granted herein;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. In respect of and in full and final satisfaction of the relevant Proofs of Claim on Exhibit 1, each of the Proofs of Claim identified on Exhibit 1 is hereby allowed (i) in the amount and claim class identified on Exhibit 1, and (ii) against the Debtor reflected in the "Debtor" column corresponding to such Claim on Exhibit 1.

2. Any appeal and/or stay of this Order pending appeal by any claimants whose Claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order.

3. For the avoidance of doubt, nothing in this Order shall govern, limit, alter or determine, for purposes of distributions, allocation of distributable value, or methods of distribution pursuant to a chapter 11 plan, the treatment, valuation, and/or denomination of any claims (including claims allowed pursuant to this Order). For the avoidance of doubt, all claims, whether allowed by this Order or otherwise, will be subject to, and treated in accordance with, the

terms of a confirmed chapter 11 plan (including any distribution methodology and mechanics contained therein).

4. Notwithstanding any provision in the Federal Rules of Bankruptcy Procedure to the contrary, (i) the terms of this Order shall be immediately effective and enforceable upon its entry, and (ii) the Debtors may, in their discretion and without further delay, take any action and perform any act authorized under this Order.

5. The Debtors' claims agent, Kroll Restructuring Administration LLC, and the Clerk of this Court are authorized to take any and all actions necessary and appropriate to give effect to this Order.

6. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Notice of Presentment or the implementation, interpretation or enforcement of this Order.

Dated: _____, 2024
New York, New York

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Allowed Claims

Genesis Global Holdco, LLC, Case No. 23-10063
Exhibit 1 - Allowed Claims

Ref	Name of Claimant	Case Number	Claim Number	Date Claim Filed	Debtor	Filed Amounts (In-Kind)		Filed Amounts (USD)
						Total In-Kind Amount	USD Value of In-Kind Amount	Unsecured Amount
1	NAME REDACTED	23-10064	16	2/13/2023	Genesis Global Capital, LLC		\$ -	\$ 164,165.88
2	NAME REDACTED	23-10064	17	2/22/2023	Genesis Global Capital, LLC		\$ -	\$ 2,047,278.14
3	NAME REDACTED	23-10064	23	3/3/2023	Genesis Global Capital, LLC	BTC 0.69768223	\$ 14,715.50	\$ -
4	NAME REDACTED	23-10064	34	3/14/2023	Genesis Global Capital, LLC		\$ -	\$ 1,322,415.58
5	NAME REDACTED	23-10064	36	3/14/2023	Genesis Global Capital, LLC		\$ -	\$ 16,078.05
6	NAME REDACTED	23-10064	85	4/13/2023	Genesis Global Capital, LLC	USDC 5,444.93	\$ 5,453.15	\$ -
7	NAME REDACTED	23-10064	106	4/20/2023	Genesis Global Capital, LLC	SOL 100,000	\$ 2,128,000.00	\$ -
8	NAME REDACTED	23-10064	107	4/21/2023	Genesis Global Capital, LLC	YFI 117.6837	\$ 792,780.95	\$ -
9	NAME REDACTED	23-10064	117	4/23/2023	Genesis Global Capital, LLC		\$ -	\$ 1,016,515.33
10	NAME REDACTED	23-10064	134	4/25/2023	Genesis Global Capital, LLC		\$ -	\$ 7.42
11	NAME REDACTED	23-10064	136	4/25/2023	Genesis Global Capital, LLC		\$ -	\$ 7,402,718.72
12	NAME REDACTED	23-10064	167	5/1/2023	Genesis Global Capital, LLC	BTC 31.64	\$ 667,350.25	\$ -
13	NAME REDACTED	23-10064	171	5/3/2023	Genesis Global Capital, LLC	BTC 50.7164383363642	\$ 1,069,710.10	\$ -
14	NAME REDACTED	23-10064	173	5/3/2023	Genesis Global Capital, LLC	BTC 0.37 ETH 5.981 ETHW 5.981 USD 379.88 USDC 150.44	\$ 17,655.91	\$ -
15	NAME REDACTED	23-10064	177	5/3/2023	Genesis Global Capital, LLC	BTC 0.96	\$ 20,248.30	\$ -
16	NAME REDACTED	23-10064	178	5/3/2023	Genesis Global Capital, LLC	BTC 0.00193533	\$ 40.82	\$ -
17	NAME REDACTED	23-10064	183	5/4/2023	Genesis Global Capital, LLC		\$ -	\$ 330.60
18	NAME REDACTED	23-10064	184	5/5/2023	Genesis Global Capital, LLC	USDC 18.06	\$ 18.09	\$ -
19	NAME REDACTED	23-10064	187	5/5/2023	Genesis Global Capital, LLC		\$ -	\$ 11.63
20	NAME REDACTED	23-10064	191	5/6/2023	Genesis Global Capital, LLC	BTC 0.00011223	\$ 2.37	\$ -
21	NAME REDACTED	23-10064	192	5/9/2023	Genesis Global Capital, LLC	USDC 28.95	\$ 28.99	\$ -
22	NAME REDACTED	23-10064	205	5/8/2023	Genesis Global Capital, LLC	BTC 50.6512328666367	\$ 1,068,334.79	\$ -
23	NAME REDACTED	23-10065	208	5/10/2023	Genesis Asia Pacific Pte. Ltd. (Singapore)		\$ -	\$ 7,366,801.41
24	NAME REDACTED	23-10064	211	5/9/2023	Genesis Global Capital, LLC	BTC 2.49893037	\$ 52,707.39	\$ -
25	NAME REDACTED	23-10064	218	5/11/2023	Genesis Global Capital, LLC	BTC 0.00053951	\$ 11.38	\$ -
26	NAME REDACTED	23-10064	222	5/10/2023	Genesis Global Capital, LLC	USDC 650,000	\$ 650,981.50	\$ -
27	NAME REDACTED	23-10064	226	5/10/2023	Genesis Global Capital, LLC	ETH 3,048.43150771807	\$ 4,739,244.04	\$ -
28	NAME REDACTED	23-10064	242	5/15/2023	Genesis Global Capital, LLC	BTC 5.94923864 USDC 321,875.10805	\$ 447,842.36	\$ -
29	NAME REDACTED	23-10064	243	5/14/2023	Genesis Global Capital, LLC	BTC 0.00347963	\$ 73.39	\$ -
30	NAME REDACTED	23-10064	244	5/14/2023	Genesis Global Capital, LLC	USDC 29.97	\$ 30.02	\$ -
31	NAME REDACTED	23-10064	254	5/13/2023	Genesis Global Capital, LLC	BTC 0.00774235	\$ 163.30	\$ -
32	NAME REDACTED	23-10064	264	5/15/2023	Genesis Global Capital, LLC	USDC 22	\$ 22.03	\$ -
33	NAME REDACTED	23-10064	278	5/16/2023	Genesis Global Capital, LLC	BTC 35.2739838900709	\$ 743,998.16	\$ -
34	NAME REDACTED	23-10064	280	5/16/2023	Genesis Global Capital, LLC	BTC 2.5753666870038	\$ 54,319.58	\$ -
35	NAME REDACTED	23-10064	281	5/16/2023	Genesis Global Capital, LLC	BTC 4.52960143497535	\$ 95,538.26	\$ -
36	NAME REDACTED	23-10064	286	5/16/2023	Genesis Global Capital, LLC		\$ -	\$ 1,649,111.97

Ref	Name of Claimant	Case Number	Claim Number	Date Claim Filed	Debtor	Filed Amounts (In-Kind)		Filed Amounts (USD)
						Total In-Kind Amount	USD Value of In-Kind Amount	Unsecured Amount
37	NAME REDACTED	23-10064	299	5/17/2023	Genesis Global Capital, LLC	BTC 129.486933316938 USDC 1,032,141.42547413	\$ 3,764,835.77	\$ -
38	NAME REDACTED	23-10064	303	5/17/2023	Genesis Global Capital, LLC		\$ -	\$ 8,510.35
39	NAME REDACTED	23-10064	305	5/17/2023	Genesis Global Capital, LLC	BTC 20.24 ETH 112.66 ETHW 112.38	\$ 602,480.08	\$ 2,649,329.00
40	NAME REDACTED	23-10064	317	5/18/2023	Genesis Global Capital, LLC	BTC 30.369863014335 USDC 102,174.65752377	\$ 742,889.48	\$ -
41	NAME REDACTED	23-10064	329	5/18/2023	Genesis Global Capital, LLC	USDC 1,030,332.62	\$ 1,031,888.42	\$ -
42	NAME REDACTED	23-10064	332	5/18/2023	Genesis Global Capital, LLC	BTC 0.000383898790404647	\$ 8.10	\$ -
43	NAME REDACTED	23-10064	340	5/19/2023	Genesis Global Capital, LLC	USDC 53,695.31	\$ 53,776.39	\$ -
44	NAME REDACTED	23-10064	341	5/19/2023	Genesis Global Capital, LLC	BTC 40.15342466	\$ 846,915.23	\$ 3,999,980.00
45	NAME REDACTED	23-10064	342	5/19/2023	Genesis Global Capital, LLC	SOL 203,211.47687126	\$ 4,324,340.23	\$ -
46	NAME REDACTED	23-10064	349	5/19/2023	Genesis Global Capital, LLC	XLM 36,521,753.42 USDC 10,177,808.2	\$ 13,269,915.29	\$ -
47	NAME REDACTED	23-10064	360	5/21/2023	Genesis Global Capital, LLC	BTC 40.9906068248926 ETH 287.560306910642 USDC 163.99609643255	\$ 1,311,792.93	\$ -
48	NAME REDACTED	23-10064	383	5/20/2023	Genesis Global Capital, LLC	BTC 243.7065891 ETH 999.92422541	\$ 6,694,786.70	\$ -
49	NAME REDACTED	23-10064	386	5/20/2023	Genesis Global Capital, LLC	BTC 180 ETH 1,400	\$ 5,973,066.40	\$ -
50	NAME REDACTED	23-10064	388	5/21/2023	Genesis Global Capital, LLC	BTC 28.1494219498329 ETH 634.406502573914 ETHW 624.574306517803	\$ 1,582,405.48	\$ 595,767.02
51	NAME REDACTED	23-10064	397	5/21/2023	Genesis Global Capital, LLC		\$ -	\$ 20.00
52	NAME REDACTED	23-10064	410	5/22/2023	Genesis Global Capital, LLC	BTC 0.0282393968034333	\$ 595.62	\$ -
53	NAME REDACTED	23-10063	412	5/22/2023	Genesis Global Holdco, LLC		\$ -	\$ 55,072.30
54	NAME REDACTED	23-10064	416	5/22/2023	Genesis Global Capital, LLC	USDC 115.4	\$ 115.57	\$ -
55	NAME REDACTED	23-10064	503	5/22/2023	Genesis Global Capital, LLC	HNT 873,125.05	\$ 2,601,563.40	\$ -
56	NAME REDACTED	23-10064	506	5/22/2023	Genesis Global Capital, LLC	BTC 0.00047888	\$ 10.10	\$ -
57	NAME REDACTED	23-10064	1134	10/27/2023	Genesis Global Capital, LLC	BTC 1,000.19	\$ 21,095,987.48	\$ -